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11 SYNPEP CORPORATION and CHI YANG

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 OAKLAND DIVISION

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 SYNPEP CORPORATION and  
19 CHI YANG,

20 Defendants.

Case No. CR 06-0374 SBA

**STIPULATION AND ORDER FOR  
MODIFICATION TO DEFENDANT CHI  
YANG'S BOND SECURING HIS  
RELEASE**

21 On May 31, 2006, this Court signed an order releasing Defendant Chi Yang on a  
22 \$500,000 bond and imposing various conditions of release. The \$500,000 bond is currently  
23 secured by property located at 2189 Las Trampas Road in Alamo, CA (the "Las Trampas  
24 Property"). The Las Trampas property is owned by Mr. Yang and his wife, Angela Chiang, both  
25 of whom signed the order of release as sureties.

26 Since Mr. Yang's release in 2006, the government, Mr. Yang, and SynPep  
27 Corporation have engaged in extensive settlement discussions, which ultimately resulted in the  
28 filing of proposed plea agreements on February 15, 2008. A hearing for change of plea and  
sentencing is now set for June 10, 2008.

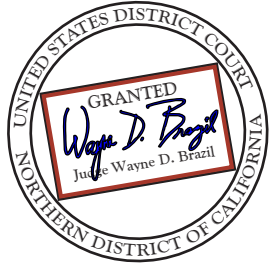
In light of the imminent resolution of this matter, Mr. Yang respectfully requests

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that the amount of his bond be lowered to \$75,000, to be secured with cash, and that the Las Trampas Property be fully reconveyed. These proposed changes have been discussed with Assistant United States Attorney Stacey Geis, who does not oppose them.

IT IS SO ORDERED.

Dated: March 11, 2008



WAYNE D. BRAZIL  
UNITED STATES MAGISTRATE JUDGE

Approved as to form:

/s/: Craig H. Bessenger  
CRAIG H. BESSENGER  
Attorneys for Defendant Chi Yang

/s/: Stacey Geis  
STACEY GEIS  
Assistant United States Attorney

1 **Proof of Service**

2 I, Stephanie Chan, declare as follows:

3 I am over eighteen years of age and not a party to the within action; my business  
4 address is 899 Ellis Street, San Francisco, California 94109; I am employed in the County of  
5 San Francisco.

6 On March 7, 2008, I served a copy, with all exhibits, of the following documents:

- 7 • STIPULATION AND [PROPOSED] ORDER FOR MODIFICATION TO DEFENDANT  
8 CHIN YANG’S BOND SECURING HIS RELEASE

9  X  (BY ELECTRONIC SERVICE) I caused an electronic delivery subject to 28 U.S.C  
10 ¶1746, Local Rules or General Orders of this Court regarding Electronic Case Filing. All  
11 pleadings and papers must be electronically served in accordance with those Rules or General  
12 Orders with email address(es) as noted below:

<p>13 <b>Stacey P. Geis</b> 14 U.S. Attorney's Office 15 450 Golden Gate Avenue 16 11th floor 17 San Francisco, CA 94102 18 415-436-7200 19 Email: Stacey.Geis@usdoj.gov</p>	<p>20 <b>Ioana Petrou</b> 21 U.S. Attorney's Office 22 450 Golden Gate Avenue, 11th Floor 23 San Francisco, CA 94102 24 415-436-7189 or 308-7898 25 Fax: 415-436-7234 26 Email: ioana.petrou@usdoj.gov</p>
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27 I declare under penalty of perjury under the laws of the state of California that the  
28 foregoing is true and correct and that this declaration was executed on the above stated date.

29  /s/: Stephanie Chan   
30 Stephanie Chan